



BUREAU OF NARCOTICS & DANGEROUS DRUGS

January 2011

www.dhss.mo.gov/BNDD

Pseudoephedrine Database Update:

The pseudoephedrine (PSE) database emergency rule went into effect on September 28, 2010. The state has been implementing the program, providing education and enrolling pharmacies and law enforcement agencies.

At this time, all Missouri pharmacies dispensing over-the-counter (OTC) Schedule 5 PSE products should be reporting their OTC sales to the MONPLEx database. MONPLEx stands for the Missouri National Precursor Log Exchange.

Some pharmacies are still working with the department on the POS software they will be implementing to capture electronic signatures. Although the electronic signatures may not be captured yet, the pharmacies should still be logged in and submitting sales data on all PSE transactions.

Pharmacies should be enrolled in the database and submitting data, unless they have contacted the bureau regarding an exemption. Pharmacies may be exempt for the following reasons:

1. Compounding pharmacies, without OTC sales;
2. LTCF pharmacies dispensing by prescription only;
3. Hospital pharmacies treating in-patients only;
4. Pharmacies that dispense PSE only pursuant to an authorized prescription.

If a pharmacy believes they are exempt, they should contact the bureau at (573) 751-6321, or fax (573) 526-2569 and provide the reason for the exemption. All other pharmacies dispensing OTC pseudoephedrine products should be enrolled in the database. The database provider may be contacted at MONPLEx@appriss.com or call (877) 936-7539.

Educational Publications Updated

Under the link to PUBLICATIONS on this BNDD website, are additional educational handouts that have been updated for 2011. This includes guides for practitioners, EMS, and how to prevent prescription fraud. The list of controlled substances has been updated.



JEFF HEINZ/The Globe Gazette With the aid of a scanner, pharmacies now use a computerized tracking system to keep track of pseudoephedrine sales in the state of Iowa.

New Address for DEA—Western Missouri:

Registrants located East of Highway 63 in Missouri will continue to contact the St. Louis DEA office with issues.

Registrants west of Highway 63 will contact the DEA at their new office location:

Drug Enforcement Administration
7700 College Blvd., Ste. 100
Overland Park, KS 66210
(913) 951-4100

Safe and Secure Drug Disposal Act

The Safe and Secure Drug Disposal Act (S 3397) was signed into law by President Obama on October 12, 2010. This federal law is intended to allow patients to more easily and safely dispose of unwanted controlled substance prescriptions and reduce the risk of diversion.

Once the DEA has approved new regulations, patients will be able to take their unwanted controlled substance medications to certain authorized individuals and then the patients' unwanted drugs can be destroyed in a manner approved by the new federal regulations.

Although this new federal act has been signed into law, controlled substance registrants are reminded not to take possession of a patient's controlled substance prescription until new regulations have been promulgated to authorize the correct channels for these drug destructions.

Pseudoephedrine Products—What is Schedule 5 and What is Not?

The laws regarding methamphetamine precursors have changed several times since 1997. The BNDD receives calls on a regular basis to clarify what is controlled and what is not and what mid-level practitioners can prescribe. Here is a brief breakdown of the current laws for products containing ephedrine or pseudoephedrine:

Schedule 5

- * Starch based, solid dose forms
- * Available OTC, without a prescription required by the FDA.
- * Examples are pseudoephedrine 30mg tablets, or Advil™ Cold & Sinus
- * Only BNDD registrants may prescribe

Not Scheduled

- * Liquid forms, syrups, and liquid-filled gel caps;
- * Drugs not available OTC, because the FDA requires a prescription.
- * Examples are Dynex™ tablets or Lodrane™ capsules because FDA requires a prescription.
- * Mid-level practitioners may prescribe

The current status of these laws has been confusing because drugs available OTC have been made schedule 5, so mid-level practitioners cannot prescribe them yet. But if a drug requires a prescription from the FDA, it is exempt from Schedule 5 so mid-level practitioners can prescribe it. The important thing to remember is that mid-level practitioners can prescribe the drug, only if the FDA requires a prescription. If a local jurisdiction passes a local ordinance to require a prescription, this does not mean a mid-level practitioner can prescribe it. It is only determined by whether the FDA requires a prescription as a legend drug.

Breakdown of Registrants on Probation:

- ❖ 57 Registrants are on probation as of 12/31/10
- ❖ 47 For record keeping, lapses in security, failing to report thefts, lapses in registrations, prescribing outside scope of practice, illegal distribution or submitting false applications.
- ❖ 10 For theft, diversion, drug abuse, and practicing while impaired.*
- ❖ 36 are practitioners, 13 are pharmacies, 7 EMS services and 1 hospital.
- ❖ During 2010, twelve registrants voluntarily closed or surrendered their registrations in lieu of a revocation, denial of application or other discipline.

Significant Pharmacy Diversion Continues

In the July 2010 newsletter the BNDD addressed large thefts in pharmacies due lapses in audits and supervision of employees. The thefts involved technicians stealing entire stock bottles several times a week and tens of thousands of stolen doses are going unnoticed.

Please make it a point to conduct random audits of controlled substances and also compare purchasing records to what has been dispensed. Have a system of multiple employees performing checks and balances so no single employee is allowed to purchase, check in drugs and adjust records.

The largest loss in 2010 was from a former registrant that lost 63,583 doses.

REGULATORY CONTACT INFORMATION

Bureau of Narcotics & Dangerous Drugs

P.O. Box 570
Jefferson City, MO 65102-0570
Phone: (573) 751-6321
Fax: (573) 526-2569
www.dhss.mo.gov/BNDD

Drug Enforcement Administration—St. Louis

317 South 16th Street
St. Louis, MO 63103
Phone: (314) 538-4600
Fax: (314) 538-4622
www.deadiversion.usdoj.gov

Drug Enforcement Administration—Kansas City

7700 College Blvd., Ste. 100
Overland Park, KS 66210
Phone: (913) 951-4100
Fax: (913) 951-3684
www.deadiversion.usdoj.gov

Drug Enforcement Administration—Registrations

Attn: Registrations Section / ODR
P.O. Box 2639
Springfield, VA 22152-2639
(888) 882-9539
www.deadiversion.usdoj.gov

MO Healthnet Division

615 Howerton Court
P.O. Box 6500
Jefferson City, MO 65102-6500
Phone: (573) 751-3425
Fax: (573) 751-6564
www.dss.mo.gov/mhd



LICENSING BOARDS

Websites for all boards can be found at www.pr.mo.gov

Missouri Board of Pharmacy

P.O. Box 625
3605 Missouri Blvd.
Jefferson City, MO 65102-0625
Phone: (573) 751-0091
Fax: (573) 526-3464

Missouri Dental Board

P.O. Box 1367
3605 Missouri Blvd.
Jefferson City, MO 65102-1367
Phone: (573) 751-0040
Fax: (573) 751-8216

Missouri Board of Optometry

P.O. Box 1335
3605 Missouri Blvd.
Jefferson City, MO 65102-1335
Phone: (573) 751-0814
Fax: (573) 751-8216

Missouri Board of Nursing

P.O. Box 656
3605 Missouri Blvd.
Jefferson City, MO 65102-0656
Phone: (573) 751-0681
Fax: (573) 751-0075

Missouri Board of Podiatric Medicine

P.O. Box 423
3605 Missouri Blvd.
Jefferson City, MO 65102-0423
Phone: (573) 751-0873
Fax: (573) 751-1155

Missouri Veterinary Medical Board

P.O. Box 633
3605 Missouri Blvd.
Jefferson City, MO 65102-0633
Phone: (573) 751-0031
Fax: (573) 526-3856

Missouri State Board of Registration for the Healing Arts

P.O. Box 4
3605 Missouri Blvd.
Jefferson City, MO 65102
Phone: (573) 751-0098
Fax: (573) 751-3166

Police: _____

Sheriff: _____

Fire: _____